

J. J. Steinger
Bl n/r

Dept. Managers, General Foremen

M. D. Rider

ALGC - P.S. - E.C.

1-30-80

Division Approved 1980 Goals

Cleveland management has approved the attached 1980 Environmental Goals. You may find them helpful for MOSTAP planning.

I will provide a quarterly review report to Cleveland on the status of each project. The 1981 goals will be developed by June 1 in order to assist in budget planning.

We are striving for an 80% completion rate on the 1980 projects. In order to assist in project completion timetables, bi-monthly reviews will be held with each department.

Thanks for your continued support.

Doug
Doug

MDR/bp

CC: E. C. Martinelli
J. D. Fannin
A. H. Botelho 1,2
P. T. Whitmire 8
A. W. Clements 5,7
N. R. Aquino 4
W. E. Horton 6
T. H. Smith 3

NGC 17916

ENVIRONMENTAL ENGINEERS

W.C. HOLBROOK

CLEVELAND, D/5456

12/11/79

1980 ENVIRONMENTAL GOALS

We have reviewed your 1980 environmental goals and have found them to be generally in order and consistent with our needs. We have also reviewed the 1980 goals with the Environmental Management Council, including the changes suggested by Department 5456 (copy attached).

Your 1980 goals have been approved by the Environmental Management Council as conditioned by our transmittal memoranda. We solicit your comments and views on the changes we have suggested. In particular, we would like to hear from you on any points which represent a significant increase in difficulty of attainment. The great majority of these changes are, as you will find, simply requests for further discussion and elaboration on certain topics listed in your goals.

W.C. Holbrook

W.C. Holbrook

WCH:dmm

cc: J.D. Fannin
J.N. Lewis

DISTRIBUTION:

~~REDACTED~~
R.D. Konter/Henry
J.W. Robben/Louisville
R.W. Birch/Long Beach
C.J. Orsborn
T.E. Butts/Orange
K.J. Kilroy/Akron
J.A. Kiel/Pedricktown
L. Levi/Pt. Neches
V.J. DelBrocco/Plaquemine
R.D. Hardesty/ALTC

NGC 17917

RECORDS

INTER ORGANIZATION CORRESPONDENCE

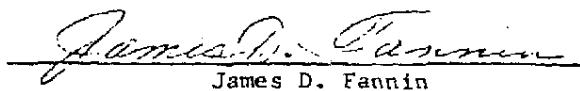
TO	DISTRIBUTION	FIELD POINT OR DEPT. & BLDG. NO.	DATE YOUR LETTER
FROM	J. D. FANNIN	D/5456	DATE THIS LETTER
SUBJECT	EXECUTIVE APPROVAL OF 1980 ENVIRONMENTAL GOALS FOR THE AVON LAKE GENERAL CHEMICAL PLANT		

The Department of Environmental Affairs has reviewed the proposed goals with regard to environmental needs, but not with respect to OSHA or safety and health requirements. The Avon Lake General Chemical plant goals are approved by the Department of Environmental Affairs conditional upon the following revisions:

1. Environmental Permits, page 3. Provide a description of all permits needed and program timing for acquisition.
2. Water reuse, page 1. Discuss scope of work, assignments and current status.
3. Odor control projects pp. 3, 6, and 8. Discuss the scope of projects identified and whether they will be adequate to eliminate odor complaints. If not, include a program to that end.
4. Discuss correspondence of solids reclaim dryer order date, 7/1/80 and capital budget year of 1982.
5. Particulates, page 5. Discuss present compliance status for silo emissions. Also, discuss whether the project can be accelerated if not now in compliance.
6. Provide a description for Plasticizer project #1, page 5.
7. Provide discussion of WTP capacity project #3, page 1.

The 1980 goals from each facility along with any revisions needed for full approval by the Department of Environmental Affairs will be presented for Council approval at the Environmental Council meeting on December 11, 1979. Please prepare to discuss and approve the environmental goals at that time.

To assist you, copies of this memo and the attached goals have been distributed to those noted below so they will be familiar with them and you may solicit their advice.


James D. Fannin

JDF/des

DISTRIBUTION

B. A. DiIiddo
R. A. Krueger
E. B. Osborne
G. F. Krcmar
J. L. Hobey
W. C. Becker
E. W. Harrington

cc: W. S. Lodge
A. W. Clements
J. F. Malone
N. R. Aquino
W. E. Horton
P. T. Whitmire

NGC 17918

BFGOODRICH CHEMICAL GROUP
ALGC PLANT
ENVIRONMENTAL GOALS

DIVISION: Facilities - Boilerhouse/WTP

Page 1 of 8

Goal Description	Requirement	Person Responsible	Capital Cost	Budget/Year	Comment
<u>Boilerhouse/WTP</u>					
<u>SO₂</u>					
1. Achieve compliance	USEPA - SO ₂	Lewis/Rider	EA-306000	No/ 6-1-80	Enviroplan and USEPA to be contacted by 2-1-80 to develop final approach
A. HAM Remodeling (Bubble)		"	\$ 19,800		
B. CEI Approach		"			
C. Coal Contract		Flikkie/Pavlovic			
<u>Water Reuse</u>					
2. Recycle CT H ₂ O to B/H31	Decrease 100 GPM to Ind. sewer	Rider/Denne	35,000 (est.)	Yes/ -80	Revised est. required Writeup " "
A. Submit AR to Cleveland	Decrease 200 GPM to storm sewer	Denne/Pavlovic		3-1-80	
B. Start Const.		" "		6-1-80	
C. Compl. "		" "		8-1-80	
<u>WTP Capacity</u>					
3. Expand Facilities	City of Avon Lake	McDonald/Rider	AR-391137	Yes/ 2-79	Warner Engr. doing design. Quotes are out for pumps.
A. Order Equipment	A. Bypasses	Kelly/Pavlovic	\$ 149,000	/3-1-80	
B. Start Construction	B. Solids Removal	" "		/7-1-80	
C. Complete "		" "		/11-1-80	
D. Startup		" "		/12-1-80	
<u>WTP Solids Dryer</u>					
4. Install Reclaim Dryer	RCRA	McDonald/Pavlovic/Adams	550,000 (Budget)	Yes/ 1-82	Project on hold until scope of production projects are defined.
A. Submit AR	NGC 17919	Kopp/Pavlovic		3-1-80	
B. Order Equipment		" "		7-1-80	

BFGOODRICH CHEMICAL GROUP
ALGC PLANT
ENVIRONMENTAL GOALS

DIVISION: Facilities - Yard

Page 2 of 8

Goal Description	Requirement	Person Responsible	Capital Cost	Budget/Year	Comment
<u>Yard</u>					
5. <u>Lagoon Testwells</u>	RCRA	Rider/Saunders/Sperry	\$ 12,000-EA 395025	No/ 1979	Samples taken in Nov., Dec, Jan.
A. Monitor Monthly	VCL/AN	" "			
6. <u>Community Monitor</u>	City of Avon Lake		12,000	No/ 1979	Reviewed Nov. data. Installing oper. enclosure.
A. Monitor Daily		Rider/Holmes/Welch	\$ 5,000-GPO 15750		
7. <u>Rock/BFI Landfill</u>	RCRA	Rider/Welch/Sperry	None	N/A	Continuing
A. Monitor Quarterly					
B. Institute Man- ifest System		Rider	None	N/A 6-1-80	Have examples from N.J. and Michigan.
C. Characterize all pot. haz- ardous types		Rider	"	" 4-1-80	Leachate testing complete. Require toxicology work

NGC 17920

BFGOODRICH CHEMICAL GROUP
ALCC PLANT
ENVIRONMENTAL COALS

DIVISION: Facilities - Customer Service/Environmental

Page 3 of 8

Goal Description	Requirement	Person Responsible	Capital Cost	Budget/Year	Comment
<u>CUSTOMER SERVICE</u>					
<u>Hazardous Drum Storage</u>	RCRA/USEPA Haz. materials	Connally / Weitzel / McDonald	AR-391532 \$13,200	No/ 7-1-80	Installation in progress.
<u>Tank Farm Leaks</u>					
1. Install pad & fence					
<u>Tank Farm Odors</u>					
2. Install alarm on TMA	USEPA/VCL	Loebick	ER-2491	No	Waiting for est.
3. Replace VCL ₂ pump	USEPA/HC	Fischer / Gargas / Lampart		No	Packing installed properly-leaks OK-job on hold.
<u>Tank Farm Odors</u>					
4. Install Methyl-methacrylate unload pump	City of Avon Lake/ odors	Gargas / ALCC Engineering		No / 6-1-80	ER to be written
<u>Environmental Control</u>					
<u>Permits</u>					
1. Renew all operating permits	Ohio EPA/Air	Rider / Product Areas	None	No/ 6-1-80	Work to start 3-1-80
<u>EPA-VCL</u>					
2. Maintain 100% compliance	EPA-VCL	Rider / Plant			Plant is 99-100% compliant.
<u>Odors</u>					
3. Reduce complaints less 1/mo.	City of Avon Lake	Rider / Horn, Gargas, Meek	None		Odor patrol instituted 10-1-79 Most odors are from ALCC.
<u>Surcharge</u>					
4. Maintain 90% goal for COD & Solids	" " "	Rider / Horn / Pavlovic	"		Plasticizer pre-heater startup 1-14-80. IPA stripping column to be installed in 1980 4th quarter.

NGC 17921

BFGOODRICH CHEMICAL GROUP
ALGC PLANT
ENVIRONMENTAL GOALS

DIVISION: Plastics - Dispersion

Page 4 of 8

Goal Description	Requirement	Person Responsible	Capital Cost	Budget/Year	Comment
<u>VGA Air Load</u>	EPA/VCL				
1. Reduced CW recovery air load from 7500 counts to 3750 counts/day		Steiniger/Bayard	None	No/ 12-1-80 <i>check & recheck</i>	Control charting needs to be continued. K. Henderson to do Feb. data. Air is significantly reduced.
<u>Poly Opening Exposure</u>					
2. Install local X-haust for poly opening testing requirements	OSHA/VCL	Bayard		No/ 2-1-80	Prototype system to be installed and evaluated <i>Evaluation - ? -</i>
<u>Strainer Opening Exposure</u>					
3. Evaluate Auto Curo filter	OSHA/VCL	Bayard		No/ 6-1-80	<i>order 2nd quarter 1980 -</i>
<u>Solid Wastes</u>					
4. Characterize sources, provide Action Plan	RCRA	Adams Steiniger/Bayard/Adams	None	No/ 12-1-79 / 2-1-80 / 12-1-80	Characterization complete. Scope and action plan forthcoming.
5. Decrease solid loss by 25% from 1979	NGC 17922	" " "			
6. Evaluate solids reducer for poly scrappings & coarse charges		" " "		/ 12-1-80	
<u>VCL Monitors</u>					
7. Auto calibration units	USEPA/VCL	Loebick/Chrisp	ER-2497	/ 3-80	Design complete obtaining quote from Bendix

BFGOODRICH CHEMICAL GROUP
ALGC PLANT
ENVIRONMENTAL GOALS

DIVISION: Plastics - Suspension

Page 5 of 8

Goal Description	Requirement	Person Responsible	Capital Cost	Budget/Year	Comment
<u>GRON EAST</u>					
<u>Solid Wastes</u>	RCRA	Ivkancec	None	No / 12-1-80	Most likely theory is that coarse chg are related to mechanical failures in metering systems
1. Coarse charges Reduce 1979 levels by 33%					
2. Solids size reduction. Evaluate alternatives	RCRA	Zimmerman/Adams		No / 8-1-80	Most likely equip. eval. will be ball mill or hammer mill
<u>Particulate</u>					
3. Submit AR for silo collectors (3-9)	Ohio EPA/Air	Ivkancec/Denne/W.M. Connally	\$253,800	/ 10-1-80	Cleve. approval pending.
<u>Recycle H₂O</u>					
3. Chg. concentrate H ₂ O to polys.	Decrease 50 GPM to Ind. sewer	Zimmerman/Urban		/ 11-1-79	Completed 3 chgs.
A. Continue prototype evaluations				/ 4-1-80	A hot water charging system has to be designed
B. Issue recommendations				/ 5-1-80	
C. Submit AR					
<u>Plasticizer</u>	City of Avon Lake				
Ind. Sewer Organic Loading					
1. Install Plast. trap prior to H ₂ O scrubber		Ramer/Graham	AR 391034 \$36,000	/ 7-1-80	Project on hold because of Eastman contract.
2. Reduce AN spec. from 0.44 to 0.2	" " "	Rider		/ 12-1-80	Dependent on No. 1 above.
3. Determine ppm DOP in bldg. discharge, WTP discharge	USEPA/priority pollutant	Rider/George/Zakriski	None	No / 6-1-80	Testing methods required

NGC 17923

BFGOODRICH CHEMICAL GROUP
ALGC PLANT
ENVIRONMENTAL GOALS

DIVISION: Plastics - Latex

Page 6 of 8

Goal Description	Requirement	Person Responsible	Capital Cost	Budget/Year	Comment
<u>VGA Air Loadings</u>					
1. Decrease by 50% from 1979 levels 31 to 15 SCFM	EPA-VCL	Meck/Herbert/Foreman	None	No / 12-1-80	Victaulic piping replaced on: East & West strippers transfer headers.
<u>Drum Wastes</u>					
2. Decrease by 50% from 1979 levels 200 to 100 drums	RCRA	Meck	to be determined	No / 12-1-80	Eliminated 2 Widdier pumps. South stripper remains to be done.
A. Process Improve- ments		Frank			
B. Sock press		P'Town/ALGC			
<u>Odor Control</u>					
3. Relocate PM vac. jet discharge to holdup pit	City of Avon Lake	Meck		No / 4-1-80	Job estimated
<u>Latex Solids</u>					
4. Pretreat bldg. effluent Submit recommen- dations	RCRA	Meck/Adams/Herbert		Yes / 1-81	Investigate Abcor or salting tech- niques

NGC 17924

BFGOODRICH CHEMICAL GROUP
ALGC PLANT
ENVIRONMENTAL GOALS

DIVISION: Plastics - Compound

Page 7 of 8

Item Description	Requirement	Person Responsible	Capital Cost	Budget/Year	Comment
<u>Compound East</u>					
<u>Particulate</u>					
1. Install alarms & broken bag detector	Ohio EPA- Particulate	Johnson/McVey	to be determined	No / 12-1-80	ER submitted
<u>OSHA - Noise</u>					
2. Install sound reduction panels around farrel & mill drives	OSHA	Johnson/McVey/Unger	to be determined	No / 12-1-80	ER submitted
<u>Heavy Metals</u>					
3. Recycle back to process	RCRA	Concheck	to be determined	No /12-1-80	Feasibility study required
<u>Compound West</u>					
<u>Heavy Metals</u>					
1. Recycle back to process	RCRA	Concheck	to be determined	No / 12-1-80	Feasibility study required
2. Tie in Danbury cyclone to a bag-house	USEPA	Shellenberger/Graham	" " " ER-2499	No / 12-1-80	Feasibility study required

NGC 17925

BFCOODRICH CHEMICAL GROUP
ALGC PLANT
ENVIRONMENTAL GOALS

Additives & Speciality

DIVISION: Polymers Chemicals - Hydrophilics

Page 8 of 8

Item Description	Requirement	Person Responsible	Capital Cost	Budget/Year	Comment
<u>Environmental</u> 1. Complete Support Document for expansion	Ohio EPA	Adams/George/Alchas	None	No / 1-2-80	Completed
2. Submit construction permits	" "	Rider/Alchas	"	No / 3-1-80	Completed in Cleve To be submitted 2-1-80
<u>Water</u> 3. Install 2nd vent condenser	City of Avon Lake	Ramer	to be determined	No / 4-1-80	Spare condenser needed to be located
<u>Waste</u> 4. 514-II distillation column, Order equipment	City of Avon Lake	Ramer		Yes / -80	Design complete to equipment in expansion AR

NGC 17926